

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all
others similarly situated, JANE DOE 2,
individually and on behalf of all others similarly
situated, JANE DOE 3, individually and on behalf
of all others similarly situated, JANE DOE 4, individually **NOTICE OF CROSS-MOTION**
and on behalf of all others similarly situated,
JANE DOE 5, individually and on behalf of all others
Similarly situated, and JANE DOE 6, individually
and on behalf of all others similarly situated,

Plaintiffs,

Civil Action No: 1:23-cv-10301-AS

v.

GOVERNMENT OF THE UNITED STATES VIRGIN
ISLANDS, FIRST LADY CECILE DE JONGH,
GOVERNOR KENNETH MAPP, SENATOR
CELESTINO WHITE, ATTORNEY GENERAL
VICENT FRAZER, GOVERNOR JOHN DE JONGH,
SENATOR CARTLTON DOWE, DELEGATE
STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.

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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jordan Merson
and Memorandum of Law, both dated May 8, 2024, Plaintiffs, by and through their undersigned
counsel, shall cross-move this Court at the Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street, New York, New York 10007, for an Order granting them leave to amend the First
Amended Complaint (“FAC”), deeming the Second Amended Complaint (“SAC”) timely filed,
and for leave to conduct discovery addressed to jurisdiction and venue, together with such other

and further relief as this Court deems just and proper.

Dated: May 8, 2024

New York, New York

Respectfully submitted,

MERSON LAW PLLC

By: /s/ Jordan Merson
Jordan Merson, Esq.
950 Third Avenue, 18th Floor
New York, NY 10022
Telephone: (212) 603-9100
Fax: (347)- 441-4171
JMerson@MersonLaw.Com
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all others similarly situated, JANE DOE 2, individually and on behalf of all others similarly situated, JANE DOE 3, individually and on behalf of all others similarly situated, JANE DOE 4, individually and on behalf of all others similarly situated, JANE DOE 5, individually and on behalf of all others similarly situated, and JANE DOE 6, individually and on behalf of all others similarly situated,

Plaintiffs,

Civil Action No: 1:23-cv-10301-AS

v.

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, FIRST LADY CECILE DE JONGH, GOVERNOR KENNETH MAPP, SENATOR CELESTINO WHITE, ATTORNEY GENERAL VICENT FRAZER, GOVERNOR JOHN DE JONGH, SENATOR CARTLTON DOWE, DELEGATE STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.

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DECLARATION OF JORDAN MERSON IN SUPPORT

I, Jordan Merson, Esq., hereby declare as follows:

1. I am a member of the law firm Merson Law, PLLC and counsel for Plaintiffs in this action.

2. I make this Declaration in support of Plaintiffs' cross-motion for an Order granting them leave to amend the First Amended Complaint ("FAC"), deeming the Second Amended Complaint ("SAC") timely filed, and for leave to conduct discovery addressed to jurisdiction and venue, together with such other as this Court deems just and proper.

3. In support thereof, I annex:

Exhibit A – Proposed Second Amended Complaint;

Exhibit B – Protective Order issued in *USVI v. JP Morgan*, 22-CV-10904;

Exhibit C – USVI’s motion to strike affirmative defenses in *USVI v. JP Morgan*, 22-CV-10904;

Exhibit D - J.P. Morgan’s opposition to the motion to strike affirmative defenses; and

Exhibit E – Plaintiffs’ motion to intervene and for disclosure in *USVI v. JP Morgan*, 22-CV-10904.

Dated: May 8, 2024

New York, New York

Respectfully submitted,

MERSON LAW PLLC

By: /s/ Jordan Merson
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